

EXHIBIT H
(Affidavit of James H. Lucas)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE
CONFERENCE OF THE NAACP,

and

TAIWAN SCOTT, on behalf of himself and all
other similarly situated persons,

Plaintiffs,

v.

HENRY D. MCMASTER, in his official
capacity as Governor of South Carolina;
THOMAS C. ALEXANDER, in his official
capacity as President of the Senate; LUKE A.
RANKIN, in his official capacity as Chairman
of the Senate Judiciary Committee; JAMES H.
LUCAS, in his official capacity as Speaker of
the House of Representatives; CHRIS
MURPHY, in his official capacity as Chairman
of the House of Representatives Judiciary
Committee; WALLACE H. JORDAN, in his
official capacity as Chairman of the House of
Representatives Elections Law Subcommittee;
HOWARD KNAPP, in his official capacity as
interim Executive Director of the South
Carolina State Election Commission; JOHN
WELLS, Chair, JOANNE DAY, CLIFFORD
J. EDLER, LINDA MCCALL, and SCOTT
MOSELEY, in their official capacities as
members of the South Carolina Election
Commission,

Defendants.

Civil Action No. 3:21-cv-03302-JMC-TJH-
RMG

AFFIDAVIT OF JAMES H. LUCAS

PERSONALLY APPEARED BEFORE ME, James H. Lucas, who after first being duly
sworn, deposes and states as follows:

1. I am above the age of eighteen (18) and I submit this affidavit based upon my personal knowledge.

2. I am currently the Speaker of the South Carolina House of Representatives, a defendant in this case. I was elected Speaker of the House on December 2, 2014.


3. As the current Speaker of the House, I am a named defendant in this case and expect be one of the House Defendants' witnesses in this litigation including at trial.

4. Prior to being elected Speaker of the House, I was involved in previous redistricting litigation, including the redistricting cycles that led to the cases of *Colleton Cty. Council v. McConnell*, 201 F. Supp. 2d 618 (D.S.C. 2002) and *Backus v. South Carolina*, 857 F. Supp. 2d 553 (D.S.C.), *aff'd*, 568 U.S. 801 (2012).


5. The Honorable Richard M. Gergel ("Judge Gergel"), who I understand is currently one of the judges on the Three-Judge Panel assigned to hear this case, was lead counsel for then-Governor James H. Hodges in *Colleton County*.

6. As lead counsel for Governor Hodges in *Colleton County*, Judge Gergel deposed me in my capacity as a witness in the *Colleton County* litigation. Some 20 years later, I still have a vivid recollection of that deposition. I remember Judge Gergel's style and his deposition of me was indeed vigorous and comprehensive.

FURTHER AFFIANT SAYETH NAUGHT.


James H. Lucas

SWORN AND SUBSCRIBED TO BEFORE
ME THIS 18 day of January, 2022.


Notary Public, State of South Carolina
My Commission Expires: 1-16-25